

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ADVANCED CELLULAR SYSTEMS, CORP.

Plaintiff

Civil No. 97-2511 (JAF)

v.

PUERTO RICO TELEPHONE COMPANY;
CELULARES TELEFONICA

Civil Action: Antitrust Laws;
Discriminatory Pricing; Breach of Contract;
Tort; Collection of Monies

Defendants

Jury Trial Demanded

**REQUEST FOR LEAVE TO FILE MEMORANDUM IN REPLY TO PRTC'S SUPPLEMENTAL
MEMORANDUM IN RESPONSE TO OPPOSITION TO ACS' REQUEST FOR
AUTHORIZATION TO AMEND COMPLAINT AND FOR ENLARGEMENT OF TIME**

TO THE HONORABLE COURT:

Comes now plaintiff Advanced Cellular Systems, Corp. ("ACS"), through the undersigned attorneys and respectfully states and prays as follows:

1. On February 14th, 2007, Puerto Rico Telephone Company (PRTC) filed a supplemental memorandum in opposition¹ to ACS' *Request for Authorization to Amend Complaint*.² In its supplemental memorandum in opposition, PRTC presents various arguments that ACS must address.

2. However, the period of seven (7) days to file a reply memorandum to PRTC's supplemental opposition expires today and the appearing attorneys for ACS require a short extension of time to properly finalize its memorandum in reply to PRTC's arguments. Hence, ACS

¹Docket 52.

² On a prior date PRTC had filed a short motion. There it argued in opposition to the request for authorization to amend the complaint and requested an extension of time to file a supplementary memorandum – docket 44. Thereafter ACS filed a short reply to said motion – docket 47.

requests leave to present its memorandum in reply to PRTC's supplemental memorandum in opposition to ACS' *Request for Authorization to Amend the Complaint* and an extension of time of five (5) business days - to expire on March 5, 2007 – to file it.

WHEREFORE, ACS respectfully requests leave from this Honorable Court to file ACS' memorandum in reply to PRTC's opposition to amend the original complaint and an extension of time of five (5) business days; to expire on March 5, 2007, to present it.

I hereby certify that on February 26th, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Ricardo F. Casellas, Esq., Ricardo L. Ortiz Colón, Esq. and Mario Arroyo Dávila and Zuleika Llovet-Zurinaga, Esq..

In San Juan, Puerto Rico, this 26th day of February 2007.

s/ Jairo Mellado-Villarreal
Jairo Mellado-Villarreal, 208112
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